U.S. Department of Transportation
Federal Aviation Administration

800 Independence Ave., S.W.
Washington, D.C. 20591

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Amendment to Part 87 of the Commission's Rules to Permit Automatic Operation of Aeronautical Advisory Stations (Unicoms)	)	WT Docket No. 96-1

Comments by the Federal Aviation Administration (FAA).

The FAA has reviewed the Notice of Proposed Rule Making (NPRM) and supports the general concept of the automated Unicom only if the following six conditions are met.

1) Weather information broadcast over an automated UNICOM be announced as "ADVISORY, VFR USE ONLY". The current experimental license under which Potomac Aviation Technology Corporation (PATC) is developing the automated UNICOM service requires that weather information be announced as "ADVISORY" to prevent confusion with other automated weather broadcasts, specifically AWOS and ASOS.

2) Altimeter (barometric pressure) reporting over automated Unicom's only be allowed at airports which have no IFR approaches. No weather broadcasting be allowed over automated UNICOM when the airport also has an AWOS or ASOS. Further the FAA requests that the weather sensor be sited in a clear area that best represents the airport conditions.

2) Automated Unicom transmit power is limited to 1/2 Watt in order to minimize interference on Unicom frequencies.

3) Automated Unicom system be assigned only to 25 kHz Unicom channels (122.725, 122.975, and 123.075 MHz) due to congestion on the other Unicom channels. This requirement should not be a problem since the FCC rules require tighter tolerances for aircraft stations starting in 1997.

4) At airports where the Unicom is also the CTAF, limit the information broadcast over the automated Unicom to the items specified in § 87.213(b)(1).

5) The automated UNICOM message needs to be limited to less than one minute. The continuous transmission limit of three minutes proposed in the NPRM is much too long and automated Unicom's must be designed so they will automatically shut down after one minute of continuous operation.

6) Automated Unicoms incorporate a preemption feature to terminate automated Unicom broadcast if another transmission on the Unicom frequency is detected. The automated Unicom currently being tested by PATC utilizes this type preemption.

The FAA supports the requirement that the automated Unicom monitor the frequency prior to transmitting but believes that three seconds is probably too short a period and recommends that the automated Unicom be required to monitor the frequency for a period of five seconds prior to transmitting.

The FAA supports the requirement that an automated Unicom systems only transmit in response to brief keyed RF signals (i.e., microphone clicks form an aircraft station). While other methods of activation may be possible in the future, microphone clicks are the only method currently used to activate on-demand services in the aviation community.

The FAA concurs with the date and time stamp requirement for time sensitive information broadcast by automated Unicom systems. When a pilot speaks with a Unicom operator and receives time sensitive data such as runway conditions, there is an implied currency to the information unless the Unicom operator states otherwise. Since overnight unattended operation of automated Unicom systems is likely, a date and time stamp is necessary. If however, the automated Unicom is receiving information from automated sensors, then a notification of automatic operations could be substituted for the date and time stamp. Under these conditions, a sunset time may also be incorporated into the system which would remove items for the automated Unicom transmission if a valid sensor update has not been received within the last minute.

The FAA supports the requirement that permits only one automated UNICOM at controlled airports (where more than one UNICOM may be licensed) and that an agreement be signed prior to operating the Automated UNICOM. The FAA recommends that the agreement be filed with the FCC and that it be place in the automated UNICOM licensee's file. The FAA also notes that the proposed rule requiring the automated UNICOM to cease operations if a newly license UNICOM does not sign the agreement within 90 days could be misused by unscrupulous persons.

The FAA also has the following comments on the modifications to Part 87 relating to AWOS/ASOS. The proper definition for AWOS in § 87.5 and § 87.525 is "Automated Weather Observing System" not "Automated Weather Observation Station". The proper definition for ASOS in § 87.5 and § 87.525 is "Automated Surface Observing System" not "Automated Surface Observation Station". The proper definition for ATIS in § 87.525 is "Automatic Terminal Information Service" not "Automatic Terminal Information Station". The FAA recommends that the fourth sentence in § 87.529 be changed to read as follows "... Frequencies for AWOS/ASOS/ATIS operations will be assigned on Non-Directional Beacon frequencies in the 190-535 kHz band (except ATIS), VHF Omnidirectional Radio Range frequencies in the 108-117.95 MHz band, or aircraft VHF communications frequencies in the 118-136.975 MHz band. ...". The current and proposed wording of the fourth sentence in § 87.529 implies that only aircraft VHF communications frequency in the 118-136.975 MHz band will be assigned to AWOS/ASOS/ATIS stations.

If there are any questions, please contact Mr. Don Nellis, Spectrum Assignment and Engineering Division, ASR-100, at (202) 267-9779.

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